

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:  RAYSHELL D FITZGERALD,  Debtor,  GLOBAL LENDING SERVICES LLC,  Movant,  v.  RAYSHELL D FITZGERALD, and SCOTT F WATERMAN, Trustee, Respondents.	Bankruptcy No. 23-10686-amc  Chapter 13  Document No. 25
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**GLOBAL LENDING SERVICES, LLC’S RESPONSE TO DEBTOR’S MOTION TO  
RECONSIDER ORDER MODIFYING AUTOMATIC STAY**

AND NOW, comes Global Lending Services, LLC (“GLS”), files this response to the Debtor’s Motion to Reconsider Order Granting Relief from Stay Dated September 14, 2023:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. No averment stated.
8. Denied. By the way of further response, the averment of paragraph eight (8) is denied. Strict proof is demanded thereof.

9. Denied. By the way of further response, as of the date of this response, the Debtor is due \$160.05 for August payment; \$552.01 for the September payment and the October payment will come due and owing on October 14, 2023.

WHEREFORE, Global Lending Services, LLC hereby respectfully requests that this Honorable Court deny Debtor's Motion to Reconsider/Vacate Order Granting Relief From Stay Dated September 14, 2023.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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